



ATLAS-CAMPASPE MINERAL SANDS PROJECT

MODIFICATION 6

**ATTACHMENT 3**

**CONSIDERATION OF WORLD HERITAGE PROPERTIES  
AND NATIONAL HERITAGE PLACES**



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### A3 CONSIDERATION OF WORLD HERITAGE PROPERTIES AND NATIONAL HERITAGE PLACES LISTED UNDER THE EPBC ACT

This Attachment supports the Modification Report by providing an assessment of the potential impacts of the Modification on the world and national heritage values of World Heritage Properties and National Heritage Places under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

#### A3.1 BACKGROUND

The Modification was referred to the Commonwealth Minister for Environment and Water in November 2025 (EPBC 2025/10354) (the proposed Action). A delegate of the Commonwealth Minister determined on 22 December 2025 under section 75 of the EPBC Act that the proposed Action is a “controlled action” and is likely to have a significant impact on the following matters protected by the EPBC Act:

- World Heritage Properties (sections 12 and 15A).
- National Heritage Places (sections 15B and 15C).
- Listed threatened species and communities (sections 18 and 18A).

A Biodiversity Development Assessment Report (Appendix A) has been prepared for the Modification and contains a description of potential impacts to listed threatened species and communities relevant to sections 18 and 18A of the EPBC Act.

An Aboriginal Cultural Heritage Assessment (ACHA) (Appendix C) has been prepared for the Modification and considers heritage items of significance under the EPBC Act.

A Noise Review (Appendix D) has been prepared for the Modification and considers the likely noise impacts the Modification could have on nearby sensitive receivers, as well as nearby sensitive land (world and national heritage areas).

An Air Quality and Greenhouse Gas Assessment (Appendix E) has been prepared for the Modification and considers the likely air quality factors and greenhouse gas emissions of the Modification including consideration of Commonwealth and NSW climate change policies, guidelines and programs.

Consideration of potential visual impacts of the Modification have been discussed in the Modification Report.

This Attachment provides a detailed assessment considering potential impacts to World Heritage Properties and National Heritage Places. This Attachment further aims to assist the consent authority in determining whether the Modification has appropriately considered the impacts on World Heritage Properties and National Heritage Places in accordance with relevant guidelines and legislation under the EPBC Act.

#### *The Proposed Action*

The proposed Action referred to the Commonwealth Minister included the construction and operation of an optimised services corridor between the Atlas and Campaspe deposits. The proposed Action Area (approximately 50.5 hectares [ha]) includes the full extent of disturbance as well as its infrastructure (i.e. haul road, pipelines, electricity transmission line, soil stockpiles and water management infrastructure) (Figure A3-1).

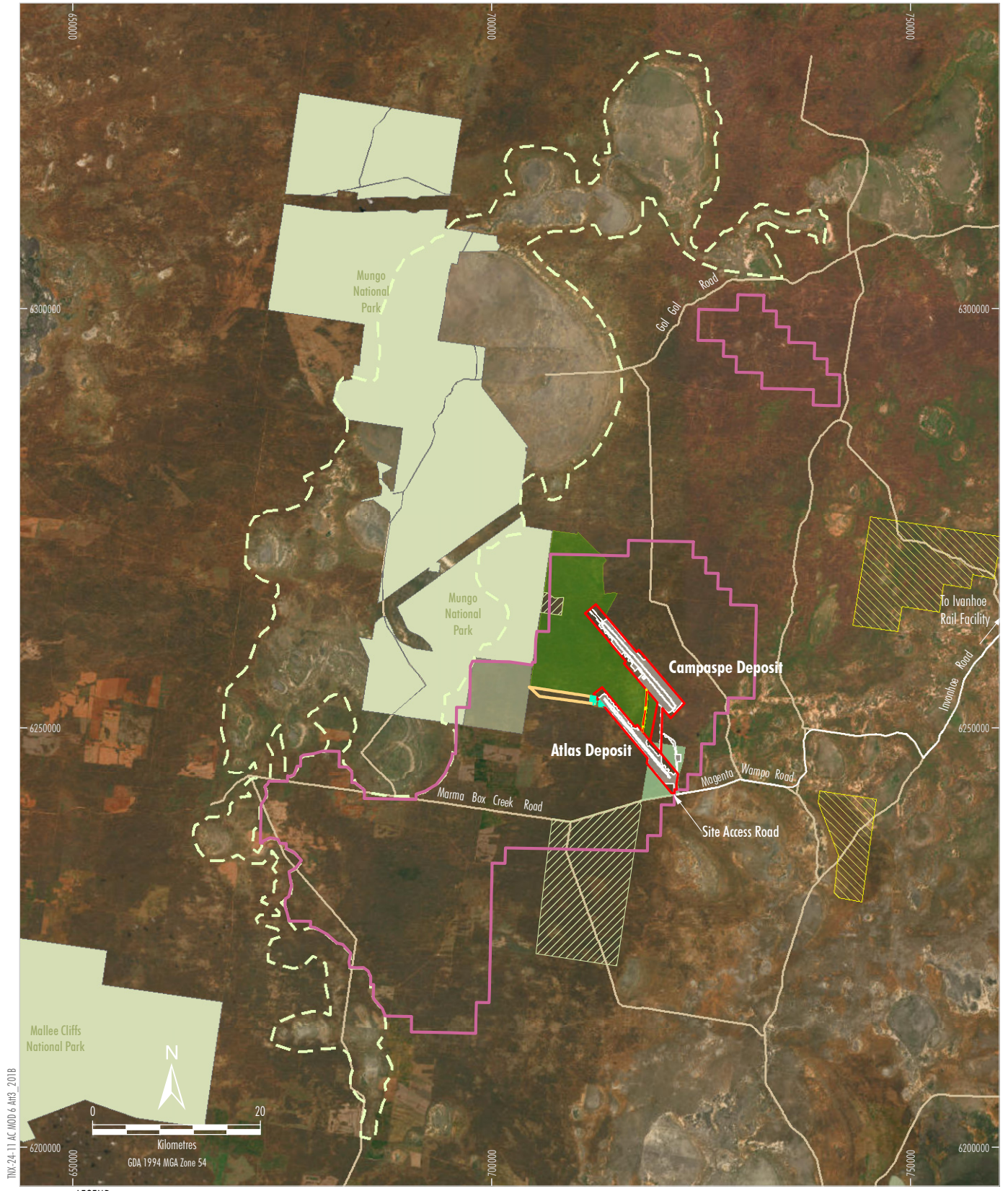
#### *World Heritage Properties and National Heritage Places to be Considered*

The Willandra Lakes World Heritage Area (Willandra Lakes WHA) is classified as a World Heritage Area and National Heritage Place and is the closest to the Atlas-Campaspe Mine site. The Willandra Lakes WHA is situated approximately 19 km west from the proposed Action.

The location of Willandra Lakes WHA in relation to the proposed Action is provided in Figure A3-1.

#### *Background of the Willandra Lakes World Heritage Area*

Willandra Lakes WHA includes the dunes of Lake Mungo, where the remains of a 42,000-year-old male and female (i.e. Mungo Man and Mungo Lady) were discovered. Mungo Lady is believed to be the oldest site of ritual cremation in the world (NSW Department of the Environment and Water Resources, 2007). The Willandra Lakes WHA was inscribed on to the World Heritage List in 1981 (Commonwealth Department of Climate Change, Energy, the Environment and Water, 2023).



Source: NSW Spatial Services (2024); Tronox (2024); Cristal Mining Australia (2012)  
 Orthophoto: Esri, Vantor, Earthstar Geographics, and the GIS User Community (2026)

- LEGEND**
- National Park/State Conservation Area
  - Southern Mallee Landuse Agreement Reserve
  - Willandra Lakes World Heritage Area
  - Timber Reserve
- Approved Project Components**
- Mining Lease Boundaries (ML 1762 & ML 1882)
  - Exploration Licence Boundary (EL 5359)
  - Surface Development Area
  - Mine Path Extent
  - Biodiversity Offset Area
  - Vegetation Management Area
- Action Components**
- Mining Lease Application (MLA2)
  - Action Area
  - Supplementary Biodiversity Offset Area
  - Potential Biodiversity Stewardship Site

**TRONOX**  
 MODIFICATION 6  
 Location of the Willandra Lakes  
 World Heritage Area

**Figure A3-1**

### A3.2 REQUIRED CONSIDERATIONS UNDER THE EPBC ACT

As the proposed Action requires assessment under the EPBC Act, sections 137 and 137A of the EPBC Act relevantly applies. Sections 137 and 137A states the following:

#### **137 Requirements for decisions about World Heritage**

*In deciding whether or not to approve, for the purposes of section 12 or 15A, the taking of an action and what conditions to attach to such an approval, the Minister must not act inconsistently with:*

- (a) *Australia's obligations under the World Heritage Convention; or*
- (b) *the Australian World Heritage management principles; or*
- (c) *a plan that has been prepared for the management of a declared World Heritage property under section 316 or as described in section 321.*

#### **137A Requirements for decisions about National Heritage places**

*In deciding whether or not to approve for the purposes of section 15B or 15C the taking of an action, and what conditions to attach to such an approval, the Minister must not act inconsistently with:*

- (d) *the National Heritage management principles; or*
- (e) *an agreement to which the Commonwealth is party in relation to a National Heritage place; or*
- (f) *a plan that has been prepared for the management of a National Heritage place under section 324S or as described in section 324X.*

Consideration of the World Heritage and National Heritage Management Principles is provided in Section A1.2.1, agreements to which the Commonwealth is party in relation to the World Heritage Properties and National Heritage Places is provided in Section A1.2.2 and any management plans that have been prepared for the Willandra Lakes WHA is provided in Section A1.2.3.

Consistent with section 324C of the EPBC Act, as a requirement of being included in the National Heritage Place List, the Minister was satisfied that Willandra Lakes WHA has the values consistent with the applicable criteria.

The heritage values of Willandra Lakes WHA as well as potential impacts of the proposed Action on these values is discussed in Section A1.3.

### A3.2.1 Management Principles

#### **World Heritage**

Schedule 5 of the *Environment Protection and Biodiversity Conservation Regulations 2025* provides the Australian World Heritage management principles as follows:

#### **1 General principles**

- 1.01 *The primary purpose of management of natural heritage and cultural heritage of a declared World Heritage property must be, in accordance with Australia's obligations under the World Heritage Convention, to identify, protect, conserve, present, transmit to future generations and, if appropriate, rehabilitate the World Heritage values of the property.*
- 1.02 *The management should provide for public consultation on decisions and actions that may have a significant impact on the property.*
- 1.03 *The management should make special provision, if appropriate, for the involvement in managing the property of people who:*
  - (a) *have a particular interest in the property; and*
  - (b) *may be affected by the management of the property.*
- 1.04 *The management should provide for continuing community and technical input in managing the property.*

The proposed Action is located 19 km away from Willandra Lakes WHA. As a result of this, the proposed Action is not anticipated to result in any direct impacts.

Tronox aims to minimise potential environmental impacts of the proposed Action through efficient project design, implementation of avoidance, management and mitigation measures. The proposed Action would not prohibit any ability to protect and conserve the Heritage values of Willandra Lakes WHA.

Further, the ACHA prepared for the Modification assessed potential impacts on Aboriginal heritage values, providing opportunity for comment and implementation of feedback.

In consideration of the above, approval of the proposed Action would not be inconsistent with the World Heritage management principles.

## National Heritage

Schedule 5B of the *Environment Protection and Biodiversity Conservation Regulations 2025* provides the National Heritage management principles as follows:

1. *The objective in managing National Heritage places is to identify, protect, conserve, present and transmit, to all generations, their National Heritage values.*
2. *The management of National Heritage places should use the best available knowledge, skills and standards for those places, and include ongoing technical and community input to decisions and actions that may have a significant impact on their National Heritage values.*
3. *The management of National Heritage places should respect all heritage values and seek to integrate, where appropriate, any Commonwealth, state, territory and local government responsibilities for those places.*
4. *The management of National Heritage places should ensure that their use and presentation is consistent with the conservation of their National Heritage values.*
5. *The management of National Heritage places should make timely and appropriate provision for community involvement, especially by people who:*
  - a. *have a particular interest in, or associations with, the place, and*
  - b. *may be affected by the management of the place.*
6. *Indigenous people are the primary source of information on the value of their heritage and the active participation of Indigenous people in identification, assessment and management is integral to the effective protection of Indigenous heritage values.*
7. *The management of National Heritage places should provide for regular monitoring, review and reporting on the conservation of National Heritage values.*

The same reasoning applied above on why the action would not impact World Heritage can also be applied to National Heritage. As a result of this approval of the proposed Action would not be inconsistent with the National Heritage management principles.

### A3.2.2 Commonwealth Party Agreements

Under section 137A and section 146H of the EPBC Act, in deciding whether or not to approve the taking of an action and what conditions to apply to it, the Minister must not act inconsistently with any agreements to which the Commonwealth is party in relation to the National Heritage place.

Nonetheless, the NSW Government advised the DCCEEW that the proposed Action would be assessed under a bilateral agreement under section 45 of the EPBC Act, relating to environmental assessment between the Commonwealth and NSW Government. Schedule 1 clause 2(a)(i) of the *Amending Agreement No. 1: Bilateral agreement made under section 45 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth)* (the Amending Agreement) applies to the proposed Action as it is being assessed under Part 4, Division 4.7 of the *NSW Environment Planning and Assessment Act 1979* (EP&A Act).

The Amending Agreement is discussed further in Section A1.4.

### A3.2.3 Management Plan

Sections 137 and 137A of the EPBC Act, the Minister must consider any plan that has been prepared for the management of World Heritage Properties and National Heritage Places under section 341s.

The then NSW Office of Environment and Heritage (NSW OEH) (2012) prepared the *Plan of Management - Willandra National Park* (the Plan of Management), which was adopted by the Minister for the Environment on 3 November 2012.

The Plan of Management has been developed in consideration of the principles outlined in the *NSW National Parks and Wildlife Act 1974* (NPW Act). The NPW Act requires that a national park be managed to (DPE, 2022):

- conserve biodiversity, maintain ecosystem function, protect geological and geomorphological features and natural phenomena, and maintain natural landscapes;
- conserve places, objects, features and landscapes of cultural value;
- protect the ecological integrity of one or more ecosystems for present and future generations;
- promote public appreciation and understanding of the national park's natural and cultural values;
- provide for sustainable visitor or tourist use and enjoyment that is compatible with the conservation of the national park's natural and cultural values;
- having regard to the conservation of the national park's natural and cultural values;

- provide for the sustainable use (including adaptive reuse) of any buildings or structures or modified natural areas; and
- provide for appropriate research and monitoring.

The Plan of Management was created to align with these objectives.

The proposed Action is not considered to be inconsistent with the management principles or protection objectives of the Plan of Management for Willandra Lakes WHA due to the reasons discussed below.

### **Protecting the Natural Environment**

The Plan of Management highlights the importance of protecting the natural environment within the protected areas. It strives to protect the natural environment by investigating methods to improve regeneration of native species and vegetation communities, undertaking actions to protect threatened species, and undertaking feral animal control to reduce erosion and improve regeneration (NSW OEH, 2012)

### **Protecting Culture and Heritage**

The Plan of Management discusses the importance of preserving the connection between Aboriginal people and the land. Willandra Lakes WHA exhibits extensive physical evidence of Aboriginal culture, including the oldest documented remains of a human have been found. A 42,000-year-old male and female (i.e. Mungo Man and Mungo Lady) were discovered (NSW Department of the Environment and Water Resources, 2007).

The ACHA prepared for the Modification (Appendix C) details the presence of Aboriginal cultural heritage within the Action Area and complies with relevant guidelines regarding consultation and assessment of Aboriginal cultural heritage.

The proposed Action activities would not impact with any Aboriginal cultural heritage sites located within Willandra Lakes WHA considering its 19 km distance from the boundary of the Willandra Lakes WHA (Appendix C).

#### **A3.2.4 Heritage Values**

Under Section 324D of the EPBC Act, a place only has a 'National Heritage value' if the place meets one of the 'National Heritage Criteria'. On 21 May 2007, Willandra Lakes WHA was included in the National Heritage List by the Minister for the Environment (Commonwealth DCCEEW, 2023).

All World Heritage Properties must meet the requirements for Outstanding universal Value to be included in the World Heritage List (Commonwealth DCCEEW 2021).

To be considered of Outstanding Universal Value, a property needs to:

- meet one or more of ten criteria;
- meet the conditions of integrity;
- if a cultural property, meet the conditions of authenticity, and
- have an adequate system of protection and management to safeguard its future.

Assessment of the impacts of the proposed Action on each value of the World Heritage Property and National Heritage Place has been assessed in accordance with the Matters of National Environmental Significance: *Significant impact guidelines 1.1* (Significant Impact Guidelines) (Department of the Environment, Water, Heritage and the Arts [DEWA], 2013) in Section 1.3.

### **A3.3 SIGNIFICANT IMPACT GUIDELINES**

The Significant Impact Guidelines (DEWA, 2013) provides overarching guidance on determining whether an action is likely to have a significant impact on Matters of National Environmental Significance (MNES). The Significant Impact Guidelines provide a 'significant impact criteria' for MNES to assist the applicant in determining the impacts of the proposed action.

The Significant Impact Guidelines describe that an action is likely to have a significant impact on the World Heritage Values of a declared World Heritage Property if there is a real if there is a real chance or possibility that it will cause (DEWA, 2013):

- one or more of the World Heritage values to be lost;
- one or more of the World Heritage values to be degraded or damaged, or
- one or more of the World Heritage values to be notably altered, modified, obscured or diminished.

The Significant Impact Guidelines describe that an action is likely to have a significant impact on the National Heritage Values of a declared National Heritage Place if there is a real if there is a real chance or possibility that it will cause (DEWA, 2013):

- one or more of the National Heritage values to be lost;

- one or more of the National Heritage values to be degraded or damaged, or
- one or more of the National Heritage values to be notably altered, modified, obscured or diminished.

Section A1.3.1 provides a summary of the potential impacts associated with the proposed Action and Section A1.3.2 describes the likelihood of the above impact and their significance.

### **A3.3.1 Potential Impacts of the Proposed Action**

The proposed Action would not have significant impacts on the natural and cultural heritage values of Willandra Lakes WHA, based on the following:

- At its closest point the Action is located approximately 19 km to the east of the Willandra Lakes WHA.
- The dunefields and sandplains on which the Action Area is located do not contain the landscape features (i.e. relic lakes and lunettes) directly associated with the natural heritage values of the Willandra Lakes WHA.
- Consultation has been undertaken with Aboriginal stakeholders including those from the Barkandji (Paakantji), Muthi Muthi and Ngiyampaa tribal groups associated with the Willandra Lakes WHA.
- The registered Aboriginal stakeholders have not identified any of the recorded sites as being of particular cultural significance (Appendix C) or raised any concerns regarding potential impacts to the Willandra Lakes WHA or its cultural values.

Notwithstanding the above, any potential impacts of the proposed Action have been considered and are summarised in the subsections below.

#### **Aboriginal Cultural Heritage Impacts**

In consideration of the 19 km distance from Willandra Lakes WHA, the ACHA concluded that the Modification would not have a significant impact on the World Heritage or National Heritage values of the Willandra Lakes WHA.

Further detail of this assessment is provided in Section 6.3 of the Modification Report and Appendix C.

#### **Biodiversity Impacts**

The BDAR assessed impacts on MNES species and communities and concluded that the Action is not likely to have a significant impact on any threatened biota or migratory species listed under the EPBC Act.

Further detail of this assessment is provided in Section 6.2 of the Modification Report and Appendix A.

#### **Air Quality and Greenhouse Gas Impacts**

In relation to the greenhouse gas emissions and air quality impacts associated with the proposed Action and the physical effects of climate change on National Heritage Place, the proposed Action is unlikely to have an indirect "impact" (as defined under the EPBC Act) on Willandra Lakes WHA as:

- The Action is estimated to decrease the direct annual greenhouse gas emissions from the Atlas-Campaspe Mine by 1.5 kilotonnes of carbon dioxide equivalent per year on average; and
- The Action is expected to decrease the dust emissions by up to approximately 4%.

#### **Visual Impacts**

The intervening topography, vegetation and significant distance mean that any potential views of the Action from Willandra Lakes WHA would represent a very small proportion of the overall landscape.

Lighting for the Action would be limited to intersections and around critical equipment (e.g. pump stations) and would be designed to Australian Standard 4282:2023 and consider the principles of the *Dark Sky Planning Guideline* (NSW DPE, 2023).

No permanent visual impacts would result from the Action as the Action Area would be rehabilitated to be a self sustaining ecosystem with endemic native species so that it can be reincorporated into the approved biodiversity area at the end of the Project life.

### A3.3.2 Significant Impact Assessment

Table A3-1 outlines the likelihood of Significant Impacts on World and National Heritage in the *Matters of National Environmental Significance Significant impact guidelines 1.1 Environment Protection and Biodiversity Conservation Act 1999 (DEWHA, 2013)*. The nature of potential impacts on World Heritage and National Heritage values is the same, as the EPBC Act significant impact criteria for both listings are equivalent. The assessment below therefore applies to both sets of relevant heritage values.

Niche Environment and Heritage (2012) (Appendix E of the EIS) concluded that the Project would not have a significant impact on the World and National Heritage values of the Willandra Lakes WHA as it will not cause:

- one or more of the World Heritage values to be lost;
- one or more of the World Heritage values to be degraded or damaged; or
- one or more of the World Heritage values to be notably altered, modified, obscured or diminished.

The proposed Action would not have significant impacts on the World and National Heritage values of the Willandra Lakes WHA as it would not cause impacts to the points stated above, as outlined in Sections A1.3.1 and A1.3.2

### A3.3.3 Mitigation and Management of Impacts

Tronox has implemented several avoidance, mitigation and reduction measures to prevent the likelihood of significant impact on MNES. The Modification Report has been informed by specialist assessments in accordance with relevant guidelines and demonstrates these mitigation and management measures in each relevant section (Section 6 of the Modification Report). Tronox has also incorporated agency feedback throughout the Modification.

Tronox would continue to implement the approved Environmental Management Plans or modify them as required for the proposed Action.

### A3.4 NSW BILATERAL AGREEMENT

In consideration of the decision that the proposed Action will be assessed under section 45 of the EPBC Act, relating to environmental assessment between the Commonwealth and NSW Government, the Amending Agreement has been considered.

Relevant to Provision 8 of the Amending Agreement, if an action is determined likely to have a significant impact on any MNES, the role and interests of Indigenous peoples in promoting the conservation and ecologically sustainable use of natural resources should, where relevant, must be recognised.

As described in this Attachment, Tronox does not expect the proposed Action would result in any impacts to the World and National Heritage Place nor its values.

Thus, this provision is not required to be applied. Notwithstanding, the ACHA prepared for the Modification undertook Indigenous consultation to identify any potential heritage impacts associated with the proposed Action. This provided opportunity to comment any interests or concerns regarding MNES (Section A1.3.1 and Appendix C).

#### A3.4.1 Indigenous Consultation

The ACHA (Appendix C) undertook consultation in accordance with the following guidelines:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (Part 6 National Parks and Wildlife Act 1974)* (Department of Environment, Climate Change and Water [DECCW], 2010a).
- *Due Diligence Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW, 2010b).
- *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (Office of Environment and Heritage [OEH], 2011)*.
- *Draft Guidelines for Aboriginal Cultural Impact Assessment and Community Consultation* (NSW Department of Environment and Conservation, 2005).
- The Australia International Council on Monuments and Sites (ICOMOS) Burra Charter (Australia ICOMOS, 1999).
- *Aboriginal Cultural Heritage: Standards and Guidelines Kit* (National Parks and Wildlife Service, 1997).

**Table A3-1**  
**Likelihood of Significant Impacts on the World Heritage Values of Willandra Lakes WHA**

Assessment criteria	Assessment	
Is the action likely to:		
Values associated with geology or landscapes		
<ul style="list-style-type: none"> <li>• damage, modify, alter or obscure important geological formations in a World Heritage place;</li> <li>• damage, modify, alter or obscure landforms or landscape features, for example, by clearing, excavating or infilling the land surface in a World Heritage place;</li> <li>• modify, alter or inhibit landscape processes, for example, by accelerating or increasing susceptibility to erosion, or stabilising mobile landforms, such as sand dunes in a World Heritage place;</li> </ul>	No	<p>The Action would not damage, modify, alter or obscure geological formations, landforms or landscapes or modify, alter, inhibit landscape processes in Willandra Lakes WHA, given:</p> <ul style="list-style-type: none"> <li>• The Action is not in Willandra Lakes WHA. At its closest point the action is located 19 km to the east of Willandra Lakes WHA.</li> <li>• The Action is located on undifferentiated dunefields and sandplains which are distinctly different to the landforms of Willandra Lakes WHA (Appendix A of the Modification Report).</li> <li>• The intervening topography, vegetation and significant distance mean that any potential views of the Action from Willandra Lakes WHA would represent a very small proportion of the overall landscape.</li> </ul>
<ul style="list-style-type: none"> <li>• divert, impound or channelise a river, wetland or other water body in a World Heritage place, and</li> <li>• substantially increase concentrations of suspended sediment, nutrients, heavy metals, hydrocarbons, or other pollutants or substances in a river, wetland or water body in a National Heritage place permanently damage or obscure rock art or other cultural or ceremonial features with World Heritage values.</li> </ul>	No	<p>The Action would not divert, impound or channelise or substantially increase concentrations of suspended sediment, nutrients, heavy metals, hydrocarbons, or other pollutants or substances in a river, wetland or water body in the Willandra Lakes WHA, given:</p> <ul style="list-style-type: none"> <li>• The Action is not in the Willandra Lakes WHA. At its closest point the action is located 19 km to the east of Willandra Lakes WHA.</li> <li>• Accordingly, the Action would not divert, impound or channelise a river, wetland or other water body in the Willandra Lakes WHA (Section 6 of the Modification Report).</li> <li>• The above, when combined with the proposed surface water management system which would include sediment/runoff control would not substantially increase concentrations of suspended sediment, nutrient, heavy metals, hydrocarbons, or other pollutants or substances in a river, wetland or water body in the Willandra Lakes WHA.</li> </ul>

**Table A3-1 (Continued)**  
**Likelihood of Significant Impacts on the World Heritage Values of Willandra Lakes WHA**

Assessment criteria Is the action likely to:	Assessment	
Other cultural heritage values including Indigenous heritage values		
<ul style="list-style-type: none"> <li>• restrict or inhibit the existing use of a World Heritage property as a cultural or ceremonial site causing its values to notably diminish over time;</li> <li>• permanently diminish the cultural value of a World Heritage property for a community or group to which its values relate;</li> <li>• alter the setting of a World Heritage property in a manner which is inconsistent with relevant values;</li> </ul>	No	<p>The Action would not restrict or inhibit the use of Willandra Lakes WHA or diminish the cultural value for the Aboriginal community to which it's values relate, given:</p> <ul style="list-style-type: none"> <li>• The Action is not in the Willandra Lakes WHA. At its closest point the Action is located 19 km to the east of Willandra Lakes WHA.</li> <li>• Consultation has been undertaken for the Action with Aboriginal stakeholders including those associated with the Willandra Lakes WHA. The full list of consulted Aboriginal parties can be found in Appendix C of the Modification Report.</li> <li>• To date, no sites or features associated with the Action area have been identified by the Aboriginal stakeholders as being of particular cultural significance, nor have any of the Aboriginal stakeholders raised any concerns regarding potential impacts to the Willandra Lakes WHA or its values Appendix C of the Modification Report.</li> </ul>
<ul style="list-style-type: none"> <li>• remove, damage, or substantially disturb cultural artefacts, or ceremonial objects, in a World Heritage property, and</li> <li>• permanently damage or obscure rock art or other cultural or ceremonial features with World Heritage values.</li> </ul>	No	<p>The Action would not remove, damage or substantially disturb cultural artefacts, ceremonial objects or features in Willandra, given:</p> <ul style="list-style-type: none"> <li>• The Action is not in the Willandra Lakes WHA. At its closest point the Action is located 19 km to the east of the Willandra Lakes WHA.</li> <li>• The Action would not impact on Aboriginal heritage sites or values within the Willandra Lakes WHA.</li> </ul>

- *Ask First; A Guide to Respecting Indigenous Heritage Places and Values* (Australian Heritage Commission, 2002).
- *NSW Minerals Industry Due Diligence Code of Practice for the Protection of Aboriginal Objects* (NSW Minerals Council, 2010).

Further details around the consultation process and outcomes can be found in the ACHA (Appendix C).

### **A3.5 OTHER CONSIDERATIONS**

#### ***Convention on Biological Diversity***

The *Convention on Biological Diversity* is an international legal instrument that has been ratified by 196 nations for the:

*“...conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out the utilisation of genetic resources...”*  
(United Nations, 2025).

The proposed Action has considered the protection of species under the EPBC Act and BC Act which consider the preservation of biological diversity.

#### ***Convention on Conservation of Nature in the South Pacific (Apia Convention)***

The *Convention on Conservation of Nature in the South Pacific* (Apia Convention) came into force for Australia in 1990. The Apia Convention is the principal international legal instrument concerning regional cooperation for nature conservation in the Pacific.

The proposed Action has considered nature conservation through the implementation of the avoid, mitigate and offset hierarchy.

#### ***Convention on International Trade in Endangered Species of Wild Fauna and Flora***

The *Convention on International Trade in Endangered Species of Wild Fauna and Flora* is an international agreement between governments that aims to ensure that the international trade in wildlife does not threaten wild populations of plants and animals (Cth DCCEEW, 2021).

Considering the proposed Action would not involve any commercial or non-commercial trade of CITES listed plants and animals, the CITES does not apply to the proposed Action.

### A3.6 REFERENCES

- Australian Heritage Commission (2002). Ask First; A Guide to Respecting Indigenous Heritage Places and Values.
- Australia International Council on Monuments and Sites (1999). Australia ICOMOS Charter for the Conservation of Places of Cultural Significance (the Burra Charter).
- Commonwealth Department of Climate Change, Energy, the Environment and Water (2021). Convention on International Trade in Endangered Species of Wild Fauna And Flora (CITES).
- Commonwealth Department of Climate Change, Energy, the Environment and Water, 2023. *World Heritage Places - Willandra Lakes Region*. Available at: World Heritage Places - Willandra Lakes Region - DCCEE
- Cristal Mining Australia (2013). Atlas-Campaspe Mineral Sands Project Environmental Impact Statement.
- Department of Environment and Conservation (2005). Draft Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation.
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